

SEMNR & HARTMAN, LLP
Babak Semnar, Esq. (SBN 224890)
Bob@sandiegoconsumerattorneys.com
Jared M. Hartman, Esq. (SBN 254860)
Jared@sandiegoconsumerattorneys.com
400 S. Melrose Dr., Suite 209
Vista, CA 92081
Telephone (619) 500-4187; Fax (888) 819-8230

Attorneys for Plaintiff, SETH BORTIN

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SETH BORTIN, an individual,

Plaintiff,

v.

CKS FINANCIAL, a business entity,
form unknown,

Defendants.

Case No.: 3:17-cv-02594-LB

**PLAINTIFF'S NOTICE OF
SETTLEMENT AND REQUEST TO
VACATE ALL PENDING
DATES/DEADLINES/HEARINGS**

PLEASE TAKE NOTICE, the parties to this matter have reached a settlement of all pending claims. Plaintiff anticipates 60 days will be necessary to finalize execution of all terms, after which time Plaintiff will file a voluntary dismissal of the entire matter, with prejudice, with party to bear its own costs and attorneys' fees.

Accordingly, Plaintiff requests the court to vacate any and all pending dates/deadlines/hearings, but to maintain jurisdiction for a period of 60 days to enforce settlement, if necessary.

SEMNR & HARTMAN, LLP

DATED: June 2, 2017

/s/ Babak Semnar, Esq.
BABAK SEMNAR, ESQ.
Attorneys for Plaintiff,
SETH BORTIN

PROOF OF SERVICE

Bortin v. CKS Financial

Case No.: 3:17-cv-02594

I am employed in the County of San Diego, State of California. I am over the age of 18 and am not a party to the within action; my business address is 400 South Melrose Drive, Suite 209, Vista, California 92081. On the date provided below, I served the foregoing document described below on the interested parties in this action by placing same in a sealed envelope.

PLAINTIFF'S NOTICE OF SETTLEMENT was served on:

John A. Tyler, Esq. General Counsel Webcollex, LLC d/b/a CKS Financial 505 Independence Parkway, Suite 300 Chesapeake, VA 23320	
---	--

☒ **(BY MAIL)** – I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail in Vista, California.

I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepaid at Vista, California, in the ordinary course of business. I am fully aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing an affidavit.

☐ **(BY FACSIMILE)** – I caused the above described document(s) to be transmitted to the offices of the interested parties at the facsimile number(s) indicated above and the activity report(s) generated by facsimile number (888) 819-8230 indicating on all pages that they were transmitted.

☐ **(BY PERSONAL SERVICE)** – I caused such envelope(s) to be delivered by hand to the office(s) of the addressee(s).

☐ **(STATE)** – I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ **(FEDERAL)** – I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Dated: 6-2-17

/s/ Babak Semnar
Babak Semnar, Esq.